



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

March 24, 2023

BY ECF

Hon. Paul A. Crotty
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007

Re: NPR et al. v. CENTCOM, 21 Civ. 10511 (PAC)

Dear Judge Crotty,

Counsel for Defendant the United States Central Command (“CENTCOM”) respectfully submits this status report in this action brought pursuant to the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”). This case concerns two consolidated FOIA requests submitted by Plaintiffs National Public Radio, Inc. and Hansi Lo Wang (“Plaintiffs”) to CENTCOM in July 2021, seeking records concerning allegations of civilian harm resulting from airstrikes conducted in October 2019 to kill or capture Abu Bakr al-Baghdadi. CENTCOM conferred with Plaintiffs, through counsel, before filing this status report.

CENTCOM made its last production of records in October 2022. Since that time, the parties have met and conferred concerning CENTCOM’s production. CENTCOM has conducted supplemental searches and internal consultations in response to Plaintiffs’ inquiries, but those searches and consultations did not identify any additional responsive records.

The parties continue to meet and confer to determine whether any issues remain for litigation. The parties propose to submit a further status report by May 29, 2023.

I thank the Court for its consideration of this letter.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney
for the Southern District of New York

/s/ Sarah S. Normand
Sarah S. Normand
Assistant U.S. Attorney
86 Chambers Street, Third Floor
New York, New York 10007
Telephone: (212) 637-2709
Sarah.Normand@usdoj.gov